

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JOHN DOES 162, et al.,	)	
	)	Case No. 2:23-cv-02991
Plaintiffs,	)	
	)	Judge Michael H. Watson
v.	)	
	)	Chief Magistrate Judge Elizabeth P.
THE OHIO STATE UNIVERSITY,	)	Deavers
	)	
Defendant.	)	
	)	
STEVE SNYDER-HILL, et al.,	)	Case No. 2:23-cv-02993
	)	
Plaintiffs,	)	Judge Michael H. Watson
	)	
v.	)	Chief Magistrate Judge Elizabeth P.
	)	Deavers
THE OHIO STATE UNIVERSITY,	)	
	)	
Defendant.	)	
	)	
WILLIAM KNIGHT, et al.,	)	Case No. 2:23-cv-02994
	)	
Plaintiffs,	)	Judge Michael H. Watson
	)	
v.	)	Chief Magistrate Judge Elizabeth P.
	)	Deavers
THE OHIO STATE UNIVERSITY,	)	
	)	
Defendant.	)	
	)	
JOHN DOE,	)	Case No. 2:23-cv-02996
	)	
Plaintiff,	)	Judge Michael H. Watson
	)	
v.	)	Chief Magistrate Judge Elizabeth P.
	)	Deavers
THE OHIO STATE UNIVERSITY,	)	
	)	
Defendant.	)	
	)	

EDWARD GONZALES, et al.,	)	Case No. 2:23-cv-03051
	)	
Plaintiffs,	)	Judge Michael H. Watson
	)	
v.	)	Chief Magistrate Judge Elizabeth P.
	)	Deavers
THE OHIO STATE UNIVERSITY,	)	
	)	
Defendant.	)	
_____	)	

**CASE MANAGEMENT ORDER NO. 2**

**Plaintiff Medical and Employment Records Procurement**

1. The Court hereby issues the following supplemental Case Management Order (“CMO”) governing Plaintiff Fact Sheet associated discovery, to govern the form and procedure for the procurement of Plaintiff medical and employment records in the above-captioned cases.

**I. Plaintiff Medical and Employment Record Procurement**

2. At the request of Plaintiffs’ counsel and endorsed by the Court, Defense counsel is making arrangements to use a third-party vendor, Medical Research Consultants (“MRC”), to procure medical and employment records. Plaintiffs and Defendant have agreed to split the costs related to obtaining medical and employment records.

3. When forwarding a Plaintiff’s completed medical and/or employment record authorization to counsel for Defendant and MRC, designated counsel for that Plaintiff will complete the Authorized Access Form attached hereto as Exhibit A identifying each Plaintiff’s name and Doe Number (if applicable), the case name and case number in which the Plaintiff’s claims are filed, and the identification of persons authorized to access the Plaintiff’s medical and employment related information, pursuant to Paragraph I. 6 below.

4. After a Plaintiff’s records are requested by Defendant’s counsel, MRC will notify

designated counsel of record for that Plaintiff when requested records are collected.

5. An explanation of the costs, contacts, and procedures for using MRC is attached as Exhibit B to this Order.

6. MRC will obtain, process, and provide all records to Defendant's counsel. Concurrent with providing records to Defendant's counsel, and when requested, MRC will grant access to those records via its secure portal, "MRCRecords," to those persons identified by the Plaintiff's counsel in the Authorized Access Form, subject to the cost structure and procedures contained in Exhibit B to this Order.

7. Based on the parties' agreement, the form Authorization for Release of Health Information previously approved by the Court as Exhibit 3 to CMO No. 1 is hereby amended and replaced by the form Authorization for Release of Health Information attached hereto as Exhibit C. Also based on the parties' agreement, the form Authorization for Release of Employee Records previously approved by the Court as Exhibit 4 to CMO No. 1 is hereby amended and replaced by the form Authorization for Release of Employee Records attached hereto as Exhibit D.

8. By agreement of the parties, Plaintiffs' counsel shall provide executed, undated Authorizations to counsel for Defendant, along with a list of medical providers and employers, for forwarding to MRC. Counsel for Defendant and MRC have permission to populate medical provider and employer names and addresses, dates (and where applicable, re-date) undated Authorizations before sending them to records custodians.

## **II. Confidentiality.**

9. Plaintiffs and their counsel expressly understand and have agreed that MRC and its employees are persons to whom Plaintiffs' identities and confidential information may be disclosed, pursuant to paragraph 6.c. of the December 20, 2023 Protective Orders entered by the

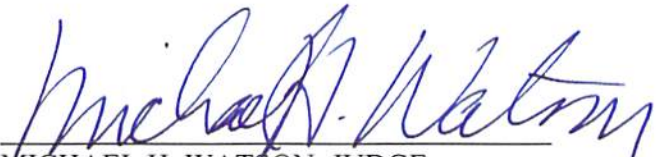
Court in each of the above-captioned cases.

**III. Conflict Resolution**

10. Plaintiffs' counsel, on behalf of any individual Plaintiff, and Defendant's counsel shall meet and confer in a good faith effort to resolve any disputes which might arise from the above procedure. If necessary, representatives of MRC also shall participate. After such meet-and-confer efforts have been attempted in good faith, counsel for a party may bring any remaining dispute(s) before the Court.

**IT IS SO ORDERED.**

Dated: June 18, 2024

  
MICHAEL H. WATSON, JUDGE  
UNITED STATES DISTRICT COURT

Dated: June 18, 2024

  
ELIZABETH A. PRESTON DEAVERS  
UNITED STATES MAGISTRATE JUDGE